75

The Reid Supply Company

911 E. Indianapolis
P. O. Box 11365
Wichita, Kansas 67202
267-1231
(AC 316)

950 Liberty Street
(at Union Avenue)
Kansas City, Mo. 64101
842-4440
(AC 816)

April 13, 1984

Reply to Wichita office

Mr. Michael J. Sanderson
Chief, Air and Waste Compliance Branch
USEPA
324 E. Eleventh St.
Kansas City, Mo. 64106

Dear Mr. Sanderson:

Enclosed is Reid Supply's response to the recent EPA inspection. Please let me know if you have any questions.

Yours truly,

David D. Trombold

David Trombold
Hazardous Waste Coordinator

cps: John Goetz, KDHE

1. The daily inspection log has been updated to include space for the inspector's initials and title (see example). In addition, the weekly inspection log has been updated to include each individual tank for inspection (See sample).

2. The portable P.A. system is at the facility and the radio and three alarms will be installed at the first of next week.

3. As seen in the copy of the contingency plan, arrangements have been made with Phillips Company to provide a back hoe adwquate to control a major spill.

4. The update contingency plan as provided will be sent to the local authorties listed above on Monday of next week.

5. The location of emergency equipment has been included in the updated contingency plan.

6. The missing signature on the manifest was corrected on our records and the generator's. Greater care will be taken to see that the signature is on the manifest.

7. Please let me know if I can provide any additional information on the buffer zone waiver. Reid Supply can't financially afford to build a new drum storage facility at this time.

8. The waste analysis program has been totally updated with last response letter of March 29, 1984, and the additional letter dated April 13, 1984. (Enclosed copy) The analysis does include BTU Analysis on all separate wastestreams as well as the other parameters listed in the letter.

9. Samples of the cake, settling tank waste, and facility still bottoms are being collected and will be sent to Systech for BTU analysis. Results should be back in two weeks. This will show if the BTU values of each are above 8,000 BTU.

10. Greater care will be taken to train drivers to reject drums in poor condition and to train plant workers to check up on drivers before receiving all drums. This can be accomplished with the Drum Receiving checklist provided in the March 29 response letter.

11. Greater care will be taken to insure that all leaking and poor-condition drums will be identified and attended to when they are identified. They are being inspected carefully and removed now.

12. All areas with drums will be inspected according to the inclosed inspection schedule until they are removed.

13. The Closure Cost Estimate has been ammended as shown in the included closure cost estimate. It does not include all the waste drums on the facility because $20,000.00 has been set aside to clear out those extra drums in the next 3 months.

14. The closure cost has been updated as of 4/13/84. The tanks will be steamed and sand blasted. The piping will be cleaned out with a pipe cleaner brush, cut, and scrapped. The hazardous waste areas will be scraped for waste residue and the residue will be swept up and placed in 17 H drums.

15. Reid Supply has found a financial institution, Mid Kansas Federal Savings and Loan, who is willing to set up an irrovocable letter of credit according to EPA requirements as shown in the enclosed letter. However, at present they have to apply for trust fund permission as explained in the letter in order to provide a standby trust fund. If they can't provide one for some reason, can another authorized institution provide a standby trust fund and Mid Kansas just provide the letter of credit?

16. The improperly identified wastes will be disposed of in less than one month.

17. The acid containers are being moved and neutralized and will be removed from the drum area by the end of next week.

18. The drums in storage were open were to processed around the time of the inspection and have since been processed.

19. The drums that are in deteriorated condition are the priority drums to be removed according to our clean up plan. The clean up plan is as follows:

22 17 H drums/week by blending	176
82 17 E drums/week by blending and recycling	656
320 17 H drums landfilled	320
20 17 E drums/week incoming	160
	992 disposed

This is projected for two months.
This will account for 992 drums to be disposed of which will bring the 1300 into the permitted level of 500 stored waste drums.

20. The leaking drums have been removed.

21. The aisle spacing will be adjusted as drums are cleared out.

22. Precarious drum storage has been corrected.

23. The drums outside of the warehouse are a priority for removable in the drum reduction program so that security will not be a problem.

24. Drums of waste outside designated areas are a priority to remove under the reduction program.

25. Signs have been positioned as indicated on the facility map except those that had been ordered and not yet received.

26. The extra drums will be removed according to the drum reduction plan in #19 above.

DAILY INSPECTION LOG SHEET

OF OVERFILL PREVENTION MECHANISM

Possible Problems clogging, leaks, alarm not activating

Inispector Initials/Title	Date Mo/Day/Yr	Time	Status (X) Accept	Status (X) Unaccept	Observations	Date and Nature of Repairs/Remedial Actions

DAILY INSPECTION LOG SHEETS

OF LOADING AND UNLOADING AREAS

Possible Problems	Steel Plates	Weakening/Missing
	Forklift	Lift not working smoothly
	Drums	Leaking

Inspector Initials/Title	Date Mo/Day/Yr	Time	Status (X) Accept	Status (X) Unaccept	Observations	Date and Nature of Repairs/Remedial Action

600 GALLON CHLORINATED STORAGE TANK
WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Actio
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

1000 GALLON SETTLING TANK
WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Actio
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

NORTH 800 GALLON STILL FEED TANK

WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Action
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

SOUTH 800 GALLON STILL FEED TANK

WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Actic
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

4000 GALLON TRANSFER TANK

WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Actio
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

1200 GALLON TRANSFER TANK
WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Action
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

WEST 4500 GALLON STORAGE TANK

WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Actic
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

EAST 4500 GALLON STORAGE TANK
WEEKLY INSPECTION LOG SHEET

Inspector Initials/Title	Date Mo/Day/Yr	Item	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Action
				Accept	Unaccept		
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				
		Ladders (if applicable)	Damaged, structural stability				
		Structural Supports	Damaged, structural stability				
		External Shell	Leaks, deterioration				
		Pipes/Valves/ Fittings	Leaks, deterioration				

CONTINGENCY AND EMERGENCY PLAN

The following discussion provides the contingency plan and emergency procedures in case of spills, fires and explosions that might occur at Reid Supply Company.

General Facility Description:

Please refer to Enlarged Facility Drawing while reading the following general description of the operations of the Reid Supply Company plant. North of Building I are bulk nitric and muriatic acid tanks, and in the northeast corner of the property are bulk sulfuric tanks. Building I houses the two stills, lab, and acid repackaging room. Adjoining Building I are the processing tanks and recycled solvent tanks used in conjunction with the stills. Building J houses the solvent repackaging and drummed virgin and recycled solvent storage. Trombold Industrial Park is the location of the drum processing, tank storage, and waste solvent drum storage areas. There are also other businesses renting space in Trombold Industrial Park which are located in the unmarked buildings on the map. Building D in Trombold Industrial Park contains bulk chlorinated solvent storage.

If a larger leak occurs in the drum storage area, it will be necessary first to alert the emergency coordinator, put on self-contained breathing apparatus, open up doors for better ventilation, squeege the spill solvent into the sump, and pump the liquid into drums. The remaining solvent on the floor will be absorbed by oil absorbent and shoveled into a 17 H drum for disposal. The damage and leading drums will be emptied as in the above paragraph and disposed of properly. The emergency coordinator will write up a report giving the date, time of incident, people involved, cause, extent of the spill, and any injury.

If a large leak occurs in a tank it will be necessary to notify the emergency coordinator. Suitable emergency clothing will need to be worn, such as an organic vapor mask, self-contained breathing apparatus, protective eye glasses, solvent resistant gloves, and solvent resistant boots. The leaking solvent will be collected in the secondary containment dike and then pumped into drums. The remaining solvent within the dike can be absorbed by oil absorbent and shoveled into a 17 H drum for disposal.

If a transfer tank begins to leak, a drum or other container will be placed under the leak and the contents pumped into empty drums or the other transfer tank.

If a leak occurs outside any containment area, the spill will be contained as much as possible with dirt and absorbent. But if the spill is too large to be contained by available equipment, Victor L. Phillips Co. will be called and notified of our need for a 560 unit with a 24 inch back hoe and bucket. Reid Supply will send a trained driver over to drive the back hoe to Reid Supply. This will only take 15-20 minutes. Prior arrangements have been made with Phillips and having one of these units on hand is no problem. Two people can be notified during off hours to get the back hoe should there be an off hour leak. A trench or dike will be constructed to prevent spread of the spill to waterways or ignition sources. All contaminated soil will be shoveled up and placed in 17 H drums for disposal.

Fire and Explosion Procedures:

Any samll fires should be put out immediately by an available fire extinguisher. The alarm in the appropriate area will be sounded and the incident is to be reported at once to the emergency coordinator by the hand-held two-way radio, the fire department, and Derby Refinery fire brigade. The fire department is to come out at a "regular traffic speed". The person at the scene of the fire will stand with a fire extinguisher prepared for any possible fire outbreaks until the fire department arrives to inspect the scene. The emergency coordinator is to make a report giving the date, time of the incident, people involved, extent of damage, extent of remaining hazard if any, and the cause of the fire. A small fire can be classified as one that can be controlled by the largest fire extinguisher available for controlling the fire.

5 pound can control a 10 square foot BC fire
20 pound can control a 80 square foot BC fire
100 pound can control a 240 square foot BC fire

If a larger fire or an explosion occurs that cannot be controlled by a fire extinguisher, the alarm in the appropriate area will be sounded and the emergency coordinator is to be notified immediately by the hand-held two-way radio. The emergency coordinator is to notify the fire department and the Derby Refinery fire brigade of the specific location of the fire at the facility as well as quantity and type of solvents involved.

The emergency coordinator will alert others of the fire. If the fire is not brought under control, the emergency coordinator is to evacuate the area within 100 yards of the fire using the

portable address system. The evacuation will be done according to the evacuation plan that is detailed later. The emergency coordinator is to stay at a safe distance ready to give information to the firemen about the location and contents of the drums and tanks involved in the fire.

The fire department prefers that since they can reach the fire within four minutes, they want the fire hydrant available for their use rather than have Reid Supply use their own equipment.

If an emergency occurs at night where the fire department or police have been notified of the incident before the emergency coordinator, each has numbers where the emergency coordinator can be reached so that he can be on hand to direct the firemen or other emergency personnel.

Arrangements with Local Emergency Agencies:

Arrangements have been made with the Wichita Police, Wichita Fire Department, Emergency Medical Services, Civil Preparedness, and St. Francis Hospital. A packet of information is to be sent to each of them giving a map of the facility with locations of hazardous waste operations, evacuation routes, a list of hazardous waste handled at the facility, phone numbers where the primary emergency coordinator or back up emergency coordinator can be reached during off hours, and types of injuries that might occur. More detail is given in Section 11 on Preparedness and Prevention Requirements.

Names, Addresses, and Phone Numbers:

The primary emergency coordinator is Chuck Trombold, the Process Engineer. He was selected because of his knowledge of the hazardous waste handling system and other facility operations, the facility's contingency plan, the location and characteristics of the waste handled, the location of all the hazardous waste records, the facility layout, and his availability should an incident occur. He has the responsibility for coordinating all emergency response measures. He can be reached during work hours at 267-5742, 267-5987, or 267-1231. During off hours he can be reached at [redacted]. The address for this number is [redacted]. Mike Shaw, the Plant Superintendent, will be acting as assistant emergency coordinator, and can be reached at the above numbers during work hours. His home address and phone number are [redacted]

Ex. 6 PII

Emergency Equipment: (Please refer to map showing Emergency Equipment Locations)

150 pound Dry Chemical Units - The two dry chemical units for fighting fires will be used for fires that cannot be controlled by a hand held fire extinguisher in the still processing area.

Fire extinguishers - Fire extinguishers are located just within the drum processing area. Another is located in the drum storage area. Fire extinguishers are also located in the distillation processing area just inside the boiler room and just inside the still room. A fire extinguisher is located on each forklift. The use of the extinguishers is to be reviewed annually. Other extinguishers can be located on the map of Emergency Equipment Locations.

Emergency Alarms - One emergency alarm is located in the still processing area, another is located in the drum processing area, and a third is in the drum storage area. These are activated by the worker discovering the fire in the event of an emergency large enough to warn all people in the area, such as a fire.

Hand-held two-way radio - The hand-held two-way radio will accompany any personnel working in the drum storage, drum processing, or tank storage areas. The base station is located in the office in J Building. This will facilitate communication with the emergency coordinator during an emergency.

First aid kit - One first aid kit is located in the lab in Building I. Another is located in the lab just west of the drum processing area. The first aid kit contents are to be reviewed annually with each employee so that he is familiar with how each item can be used in an emergency.

Oil absorbent drums - Drums containing oil absorbent are located at each of the areas where hazardous waste is handled. The absorbent is used to prevent the spread of spills and to soak up spills that may cover a large area. Once it has absorbed liquid, it can be shoveled into a 17 H drum for disposal.

Empty drums - Empty drums are located in Building C and are kept on hand to hold waste solvent pumped into them in the case of a large spill. Eighty drums are kept on hand to contain the capacity of the larger transfer tank.

Portable public address system - The portable p.a. system, is located in the emergency coordinator's office. This will enable him to announce instructions audibly during an emergency, such as when evacuation is necessary.

Air compressor, flexible hoses with quick couplings, and portable sump pump - These are located in D Building and drum processing area. They are to be used in the case of a spill that is large enough to be pumped from the sump into emergency drums.

Emergency shower and eye wash - An emergency shower and eye wash are located in I Building and an eye wash unit and shower are located in the breakroom west of the drum processing area. These are to be used if a worker is sprayed by hazardous waste on the face, skin, or clothes.

Protective clothing, organic vapor masks , self-contained breathing apparatus, gloves, goggles, and boots - These are located in Building I and to be used if there is a chance of breathing harmful vapors or hazardous waste coming in contact with skin.

All of these emergency items are inspected and maintained according to the inspection schedule.

Evacuation Routes:

In case of fire in the drum storage area, bulk storage, or drum processing areas, the evacuation route is along the road leading out of Trombold Industrial Park. (See Enlarged Facility Map) An alternate route would be through one of the doors along the north wall fo C Building and around the north side of the property to the road leading to Missouri Pacific.

If there is a fire in the still processing area, three evacuation routes are available. (Enlarged Facility Map) An exit can be made through the gate to the south of the still processing area. Another exit is the gate to the west of the area. The third route is to go around the north side of I Building, around the east side of J Building, and out the gate just south of J Building.

Evacuation will be directed by the acting emergency coordinator through the use of the portable public address system. Once personnel have reached the area between the Reid Supply Company Plant and Trombold Industrial Park, the emergency coordinator will direct them north toward Missouri Pacific or south down New York Avenue.

Responsibilities of the Emergency Coordinator:

Whenever there is a spill, fire, or explosion, the emergency coordinator must identify immediately the character, exact source, amount of aerial extent of released materials. At the same time he is to assess possible hazard to human health or the environment that may result from the spill, fire, or explosion. This assessment must consider both direct and indirect effects of the incident. He has the authority to commit the necessary resources needed to carry out the contingency plan. If the emergency coordinator determines that the incident could threaten human health, or the environment outside the facility, he must report his findings as follows:

1. If he determines that evacuation of local areas is advisable, he must notify Civil Preparedness to help them decide whether the evacuation should be done.
2. He must call the National Response Center at 1-8---424-8802.
   The report must include:
   a) His name and phone number
   b) Name and address of the facility
   c) Time and type of incident
   d) Name and quantity of material(s) involved
   e) The extent of injuries, if any
   f) The possible hazards to human health and environment out side the facility

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and spills do not occur, reoccur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers.

If the facility stops operations during such an incident the emergency coordinator must monitor for leaks or other related occurances wherever this is appropriate.

After an emergency, the emergency coordiantor must provide for treating, storing, or disposing of recovered waste, contaminated soil, or surface water, or any other material that results from such an incident at the facility.

The emergency coordinator must see that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Responsibility of the Hazarous Waste Coordinator:

He is to notify the Region VII Administrator and the Kansas Department of Health and Environment in Topeka and Wichita that the facility has cleaned up all emergency equipment as stated above.

The Hazardous Waste Coordinator must note in his files the time, date, and detailes of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Region VII Administrator. The report must include:

1. Name, address, and phone number of the Hazardous Waste Coordinator
2. Name, address, and phone number of the facility
3. Date, time and type of incident
4. Name and quantity of the material(s) involved
5. The extent of injuries
6. The assessment of actual or potential hazards to human health or to the environment, where this is applicable
7. Estimated quantity and disposition of recovered material that resulted from the incident

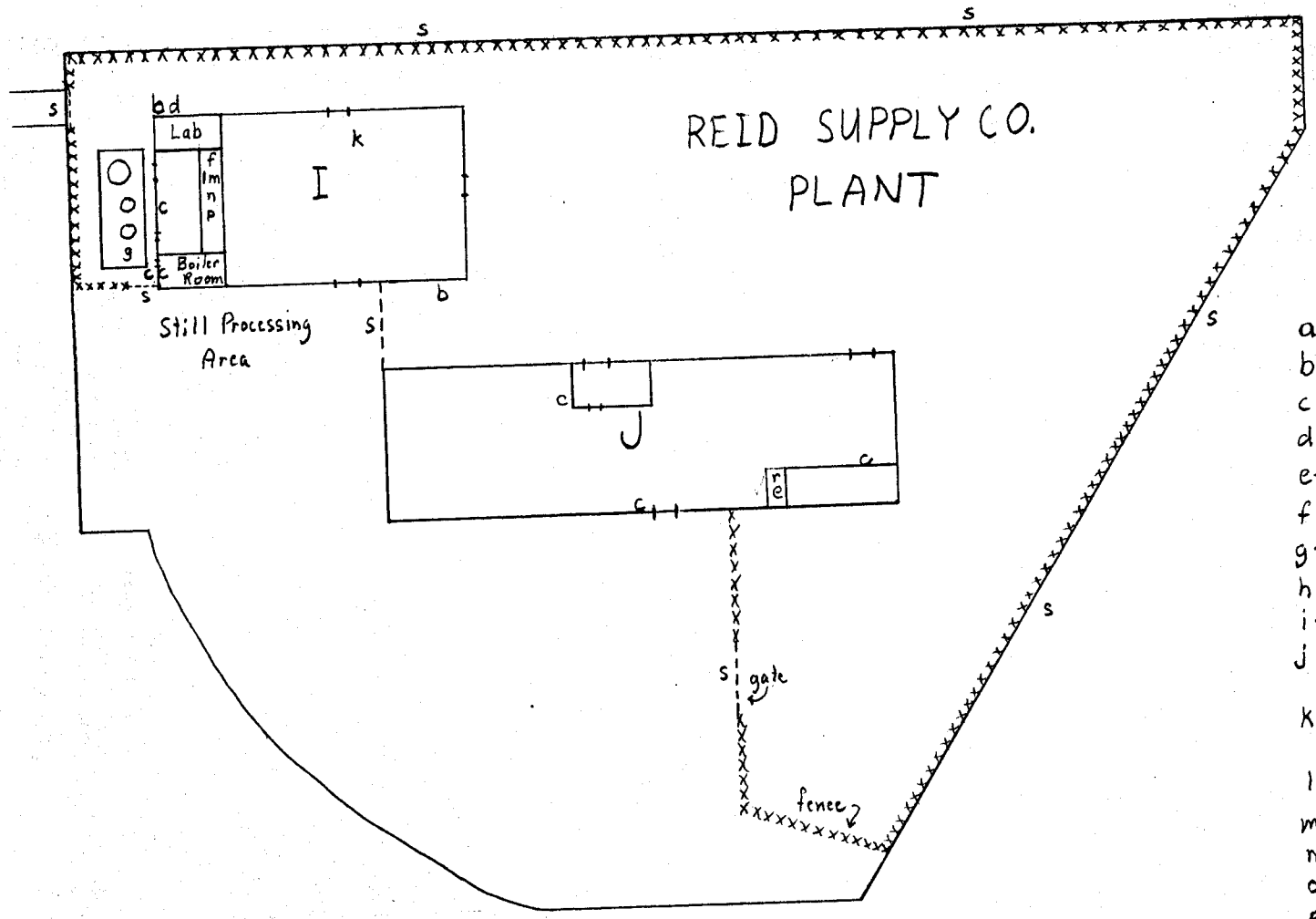
Emergency phone numbers:

Emergency	Organization/Agency	Phone No.
Injury	Emergency Medical Services	911
Hazardous Waste Spill or Release	Civil Preparedness	911
Fire/Explosion	Wichita Fire Department	911
	Marty Martin - Derby Refinery	
	before 5:00 p.m.	267-0361
	after 5:00 p.m.	[redacted]
Spill Control Equipment	Victor L. Phillips	
	3250 N. Hydraulic	Ex. 6 PII
	during hours	
	Clarence W. Barnes	838-3346
	or	
	Ken Steinhoff	
	off hours	[redacted]
	Clarence W. Barnes	
	Ken Steinhoff	

Ex. 6 PII

LOCATION OF EMERGENCY EQUIPMENT (Part 2)

3/84 D.G.T.



a- fire hydrant
b- portable 150 lb. fire extinguisher
c- fire extinguishers (hand held)
d- emergency alarm
e- two-way radio
f- portable p.a. system
g- oil absorbant
h- empty drums
i- air compressor
j- flexible hose and quick couplings
k- emergency shower or eye wash
l- goggles, face shields
m- organic vapor marks, SCBA
n- protective clothing, boots
o- portable sump pump
p- first aid kit
q- squeegee
r- hard hats
s- no smoking/danger signs

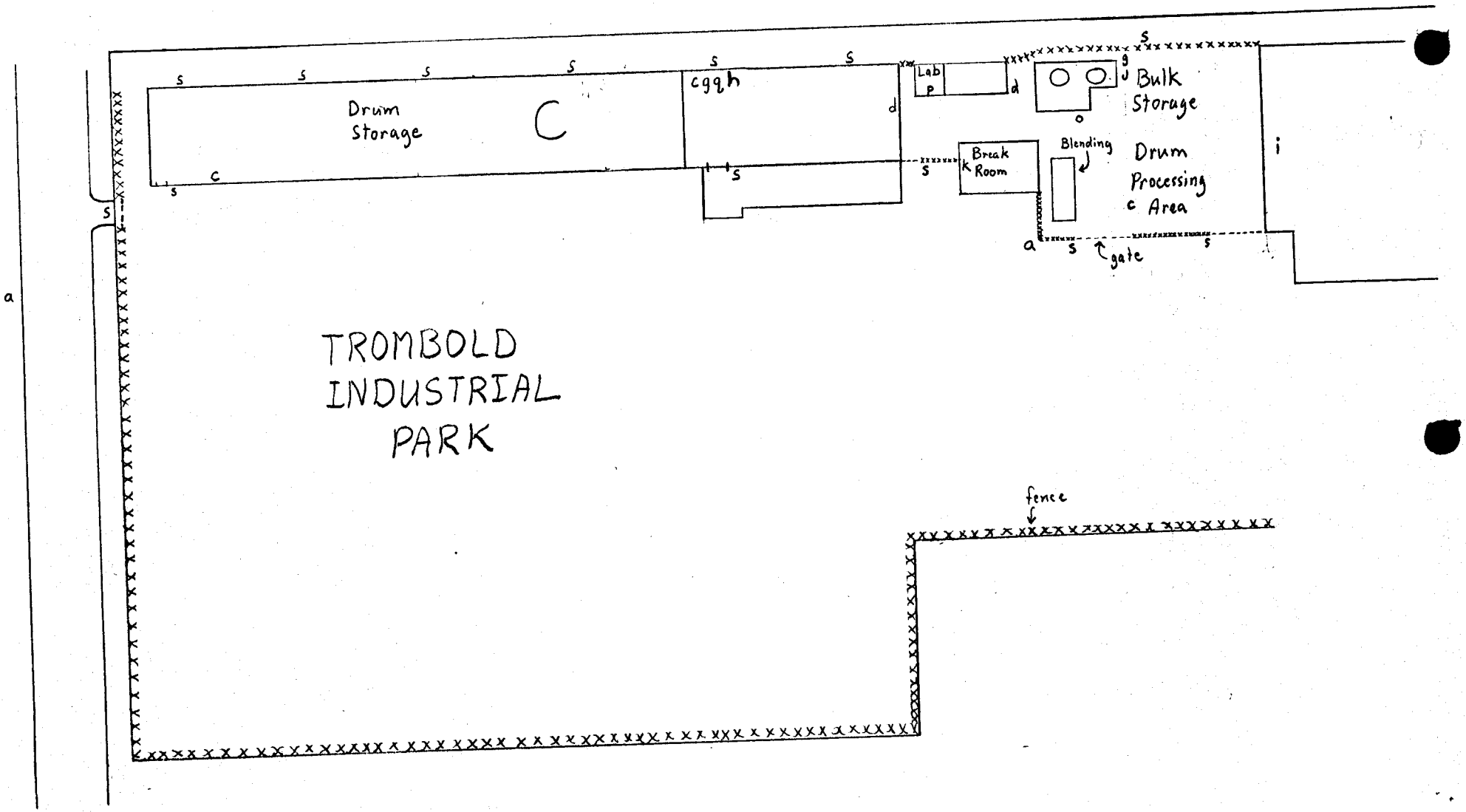
LOCATION OF EMERGENCY EQUIPMENT (Part 1)

3/84 D.G.T.

N

57 feet
1 inch

note: key is on Part 2 map



FACILITY MAP

OGT 3/84

N

86 feet
1 inch

MISSOURI PACIFIC

Legend

Barrier Fence xxxxxxx
Gate xx----xx
Fire Hydrant fh
Rail Road Track
Emergency Escape Route e e e →

Storage Tank

To Missouri Pacific Truck Terminal

Open Drainage Ditch to Canal

Underground Drainage Culvert from Missouri Pacific

Building

Parking

115 feet

85 feet

225 feet

32 feet

15 feet

Drum Storage

161 feet

Lab

18 feet

15 feet

50 feet

Tank Storage

Methanol Storage

Virgin Chlorinated Solvent Storage

Break Room

Drum Processing Area

Blending

Unloading Area

Dock

fh

5 feet between building and property line

64 feet

Fire Lane

204 feet

TROMBOLD INDUSTRIAL PARK

DERBY REFINERY

Access Route for Derby Refinery Fire Brigade (5 minutes away)

Still Processing Area

Acid Repackaging

Virgin Solvent Storage

REID SUPPLY CO. PLANT

Virgin Solvent Drum Storage

Break Room

Parking

continuous access along road

50 feet

172 feet

fh

DERBY REFINERY

Gasoline Storage Tanks

The Reid Supply Company

911 E. Indianapolis
P. O. Box 11365
Wichita, Kansas 67202
267-1231
(AC 316)

950 Liberty Street
(at Union Avenue)
Kansas City, Mo. 64101
842-4440
(AC 816)

Mr. David Wagoner
U.S.E.P.A. Region VII
324 E. 11th
Kansas City, Mo. 64106

April 13, 1984

Reply to Wichita office

Dear Mr. Wagoner:

The purpose of this letter is both to specify which parameters are to be used for the annual analysis and to simplify the fingerprinting procedures described in our response letter of March 28, 1984. The reason for specifying the parameters for the annual waste analysis is to conduct a reasonable detailed waste analysis for proper handling by measureing parameters that will be relevant to the wastestream without analyzing for unnecessary parameters for a given wastestream. This will allow the analysis to be tailored to the particular wastestream. The reason for simplifying the fingerprint analysis is to maintain reasonable control over variant wastestreams coming into Reid Supply (that do not correspond to the annual waste analysis) without causing any needless expense to the generator due to an extensive analysis.

THE ORIGINAL OR ANNUAL ANALYSIS

The basic annual analysis will measure for quantitative and qualitative solvent composition, BTU's per pound, pH, and compatibility with other organic solvents. Generators with wastestreams that are only flammable liquids will have this kind of an analysis. However, if a generator has a chlorinated hydrocarbon wastestream, then each of his wastestreams coming to Reid Supply Company will be tested annually for organic chlorides. If a wastestream is paint solids, then the heavy metals lead, barium, and chromium will be measured. If the generator handles PCB's in his operation, then PCB's will have to be measured since Reid Supply is not permitted to handle PCB's. Please refer to the enclosed waste analysis scheme, the Reid Supply Analysis Parameters and Rationale, and the Mid West Laboratory Test Methods for Parameters that replace the March 28 response letter information.

Special provision will be made for generators that have notably consistent wastestreams. If during the year significant varia-

tions from the original detailed analysis appear in the fingerprint analysis with each shipment as listed below, the detailed analysis will be repeated. As long as the wastestream remains within the accepted variations listed below and if the generator does not notify Reid Supply of any significant wastestreams, the detailed annual analysis will not need to be repeated. However, the generator audit will be repeated annually regardless of past wastestream history.

FINGERPRINT ANALYSIS

This simplified fingerprint analysis plan will be used in conjunction with the Generator Audit form provided in the response letter and modified in this mailing. Rather than include PCB, Chloride, and BTU tests in the fingerprinting analysis, only solvent composition, pH, and blending compatibility will be performed on each wastestream regardless of the size. The fingerprint analysis will include a test for PCB's if the generator handles PCB's in his operation and the possibility of PCB contamination exists as indicated by the Generator Audit form or if PCB's appear on the initial or annual detailed waste analysis. Chloride and BTU levels will be monitored by the determination of solvent composition by gas chromatography. Since chlorinated solvents are the primary source of chlorides coming into Reid Supply, the gas chromatograph will show any unusual quantities of chlorides in the form of chlorinated solvent in a given wastestream that would not line up with the original or annual detailed analysis. Any significatn variations in BTU level could also be determined by solvent composition variations.

As with the former fingerprint analysis program, when a significant variation from the original or annual detailed analysis occurs, the generator will be notified and further analysis performed on specific drums to insure proper handling of the wastestream. Significant variations that would warrant special analyses would be:

1. pH outside the range of 4-11
2. incompatible response when mixed with a sample of blended solvent
3. chlorinated solvent present or much higher in composition when compared with original or annual waste analysis
4. PCB's detected at levels over 50 ppm (this test only for special fingerprinting of wastestreams that probably contain PCB's)
5. an unusual peak in the gas chromatograph

Please refer to the enclosed diagram showing the fingerprint analysis scheme which will replace the two diagrams of the fingerprint procedures for wastestreams under ten drums and over nine.

This is a reasonable analysis program that provides information for safe and responsible handling of wastestreams and insures wastestream consistency between the annual waste analyses each time the wastestream comes into Reid Supply Company. It also has the advantage of simplifying the fingerprint procedure without losing significant monitoring capabilities of necessary parameters.

Please let me know if you have any questions.

Yours truly,

David D. Trombold

David Trombold
Hazardous Waste Coordinator

cps: John Goetz, KDHE

WASTE ANALYSIS SCHEME

ORIGINAL ANALYSIS, ANNUAL, OR SPECIAL ANALYSIS
DUE TO SIGNIFICANT VARIATION IN WASTESTREAM
(on representative composite sample of wastestream)

Parameters: solvent composition

pH
heavy metals (Ba, Cr, Pb)
compatibility with waste solvent mixture
organic chloride (if generator has a waste-stream containing chlorinated hydrocarbons)
PCB's (if generator handles PCB's in his operation)

↓

EACH PICK UP

↙ ↘

WASTE FOR DISTILLATION
(representative composite sample)

FINGERPRINT ANALYSIS

Parameters: solvent composition

pH
compatibility with waste solvent mixture
PCB's (if generator handles them in his operation)

↙ ↘

Fail — Special Analysis

Pass — Storage and Processing

WASTE FOR BLENDING
(representative composite samples)

FINGERPRINT ANALYSIS

Parameters: solvent composition

pH
compatibility with waste solvent mixture
PCB's (if generator handles them in his operation)

↙ ↘

Fail — Special Analysis

Pass — Storage and Processing

REID SUPPLY ANALYSIS

PARAMETERS AND RATIONALE

Parameters	Rationale
Solvent composition (qualitative and quantitative)	Handling safety, industrial hygiene, compatibility
BTU/pound	Prevent sham recycling for material going to Systech as fuel
pH (aqueous)	Drum and tank compatibility and reactivity with solvents
Organic chlorides	Systech is permitted only to receive a small percentage and chlorinated solvent waste is readily available at Reid Supply Company. It would be easy for Reid Supply to exceed the limit.
PCB's	Reid Supply is not permitted to handle above 50 ppm. For industrial hygiene at Reid Supply to prevent unexpected exposure
Compatibility with waste solvent mixture	Drum and tank compability, hazard to workers

MID WEST LABORATORIES

TEST METHODS FOR PARAMETERS

Parameters	Test Method
Solvent composition (qualitative and quantitative) (% by volume)	Gas chromatography (FID)
BTU/pound	Bomb calorimeter
pH (aqueous)	EPA Method 9040[1], electronic pH measurement of sample
Organic chlorides (% by weight)	UOP Method 395-79[2], sodium biphenyl reduction and colorimetric finish or UOP Method 588-65, sodium biphenyl reduction and potentiometric titration
PCB's (ppm)	EPA Method 8080[1], gas chromatographic analysis for organochlorine pesticide and PCB's in liquid and solid matrices

[1]Test Methods for Evaluating Solid Waste SW-846 (1983). Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, Washington, D.C. 20460.

[2]UOP Laboratory Test Methods for Petroleum and Its Products, UOP Process Division, UOP, Inc.

GENERATOR AUDIT
One form per wastestream

Date _____

Generator Name _____ EPA ID# _____

Address _____ City _____ State _____ Zip _____

Phone _____ Company Representative _____

DOT Shipping Name _____ Hazard Class _____

ID# _____ EPA Hazardous Waste # _____

SPECIFIC WASTESTREAM INFORMATION

Waste Name _____

Known components _____

_____

Process generating waste _____

Types and quantities of raw materials, catalysts, and reagents used in process _____

_____

Possible alternatives resulting in use of other hazardous or non-hazardous materials which could cause wastestream variation _____

_____

Routine variations in process operation _____

Average rate of production _____

Any variation in the rate of production _____

Time of storage onsite before shipment _____

Controlled or uncontrolled changes to waste during storage (including water) _____

Any waste analysis data for wastestream (Any analysis form) _____

_____

Approximate amount of settled solids in drums _____

Relative viscosity _____

General ranking of wastestream's ignitability or reactivity _____

_____

Previous history of waste handling and any remarkable incidents_____

_____

_____

GENERAL WASTESTREAM INFORMATION

Other sources of waste which could be intentionally or accidentally mixed with the wastestream_____

_____

Any waste containing radioactivity_____

Any waste containing PCB's_____

Procedures for managing other wastes on site_____

_____

Practices used to avoid cross-contamination_____

Specific wastes that are incompatible with this waste stream_____

_____Any present onsite_____

Provide representative sample (Consult Reid Supply for procedure)

Customer sampled_____Salesman sampled_____

Analysis provided by_____

Is the generator willing to notify Reid Supply of any significant variations in the wastestream?_____

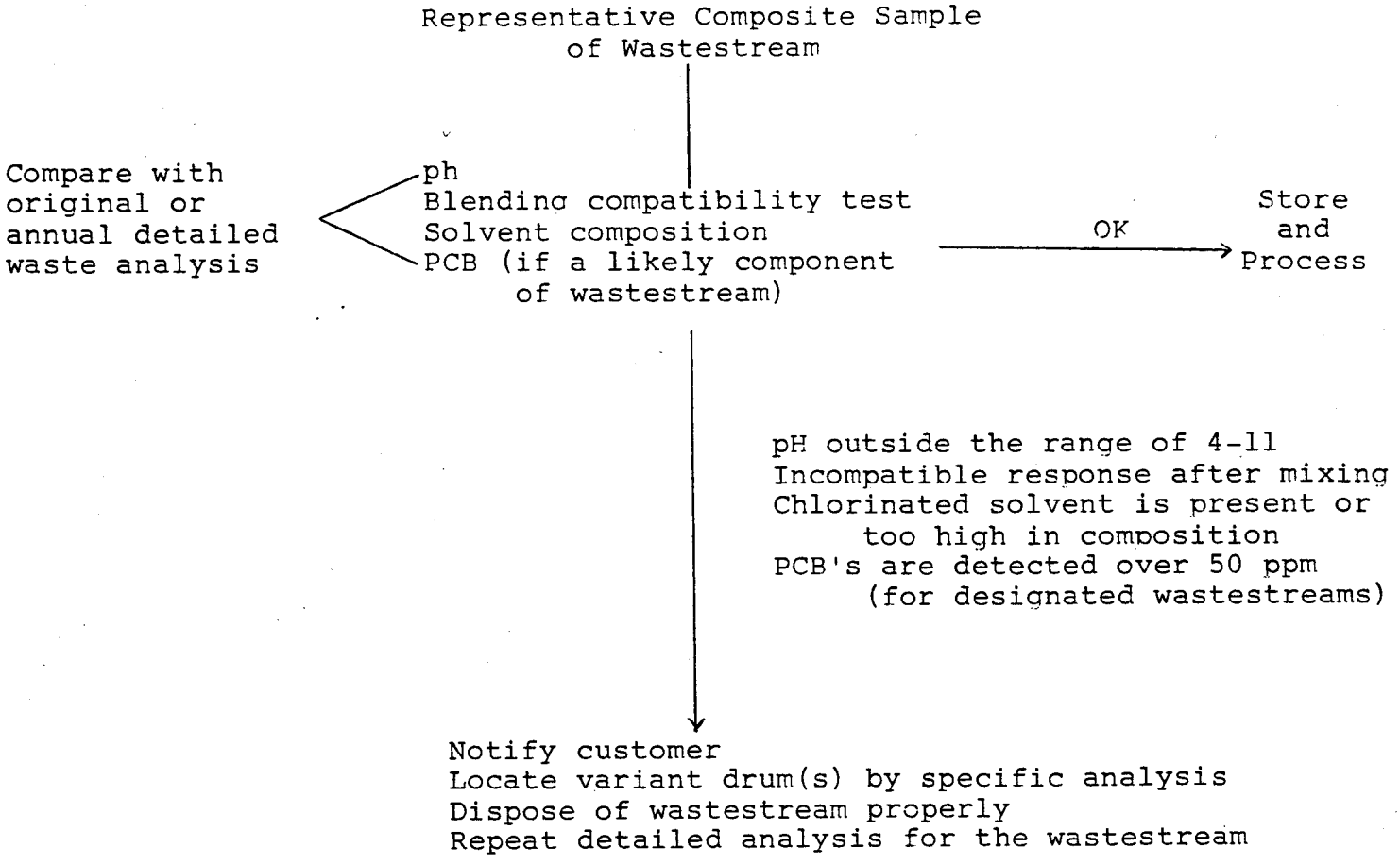
Salesman collecting information_____Date_____

I certify that the above information is correct to the best of my knowledge and I realize that if there is a significant variation between the information provided both in the detailed analysis and in the questionnaire and the wastestream received by Reid Supply Company special costs to my company and procedures may be necessary for proper handling of the waste.

Company representative_____Date_____

Cps:
Process Engineer
Customer
Salesman
File

FINGERPRINT PROCEDURE FOR INCOMING
WASTESTREAMS TO REID SUPPLY COMPANY



OPERATING AND STRUCTURAL EQUIPMENT AND CONTAINER STORAGE AREA INSPECTION LOG SHEET

Inspector's name/title _____

Date of Inspection _____ (Month/Day/Year)

Time of Inspection _____ (a.m. or p.m.)

Item	Possible Problems	Status (x)		Observations	Date and Nature of Repairs/Remedial Action
		Acceptable	Unacceptable		
Operating and Structural Equipment					
Portable Sump Pump	Power, clogging				
Dikes	Cracks, damage				
B[redacted]s, foundations	Cracks, deterioration				
Piping to holding tanks	Leaks, deterioration				
Container Storage Area					
Container Placement	Inadequate isle space				
Sealing of Containers	Open lids				
Labeling of containers	Incomplete information				
Containers *	Corrosion, leakage, structural defects				
Pallets	Damaged				
Sump Area	Cracks, deterioration, wet spots				
B[redacted] or Foundation	Cracks, deterioration, wet spots				
Dikes	Cracks, damage				
Ramps	Stress fractures, warping				
Warning Signs	Damaged				

* Also inspect drums along the outside of C Building, in the drum storage, and north of J Building

CLOSURE COST ESTIMATE 4/13/84

Cost Estimate:

The cost estimate can be broken down into four main parts. They are hazardous waste disposal, tank and piping cleaning, hazardous waste area cleanup, and disposal of tank cleaning residue.

a) Hazardous waste disposal (including labor)

17 H drums of solid flammable waste	50 drums x $54.00	= $2,700.
17 E drums of reclamable chlorinated solvents	25 drums x $5.00	= $125.00
17 E drums of non-reclaimable chlorinated solvent	25 drums x $84.25	= $2,106.25
17 E drums of flammable liquid	400 drums x 55 gal. @ .305 gal.	= $6,710
Flammable liquid in tanks	7000 gallons x .305 gallon	= $2,135
	TOTAL	$13,776.25

b) Tank and piping cleaning (including labor)

2 x 4500 gallons	2 x $195	= $390
1 x 4000 gallons	1 x 195	= 195
1 x 1200 gallons	1 x 110	= 110
1 x 1000 gallons	1 x 110	= 110
2 x 750 gallons	2 x 110	= 220
1 x 600 gallons	1 x 110	= 110
1 x 500 gallons	1 x 110	= 110
1 x 100 gallons	1 x 55	= 55
Piping	100 feet	= 200
		$1500.

c) Hazardous waste area clean up

Drum storage area clean up	2 men X 8 hours @ $7.00/hr =	$112
Drum processing area	2 men X 8 hours @ $7.00/hr =	112
Still processing area	1 man X 8 hours @ $7.00/hr =	56
		$280

d) Disposal of tank cleaning residue

1000 gallons of water from steam @ .35/gal =	$350
4 X 55 gallons sand from sand blasting @ $22/dr =	88
	$438

TOTAL $15,994.25

MID KANSAS FEDERAL

April 13, 1984

Mr. David G. Trombold
Reid Supply Company
911 E. Indianapolis
P.O. Box 11365
Wichita, Kansas 67202

Dear Mr. Trombold:

This is in response to your request that Mid Kansas Federal Savings and Loan Association provide the Reid Supply Company with a letter of credit and a standby trust agreement in order for the Company to comply with certain Federal financial requirements for owners of hazardous waste treatment, storage and disposal facilities. We have reviewed the information you provided concerning Environmental Protection Agency guidelines in this respect.

Mid Kansas is willing to provide Reid Supply Company with the letter of credit it has requested in the amount of $16,000, provided Reid Supply Company agrees to maintain a certificate of deposit as collateral at Mid Kansas for the same amount ($16,000) that the letter of credit is for, and provided further that Reid Supply Company agrees to pay a fee of 1% of the amount of the letter of credit for each year the letter of credit is in force.

While the letter of credit could be issued immediately, Mid Kansas does not currently have the authority to provide the type of standby trust agreement you requested due to its limited trust powers. The Home Owners Loan Act of 1933 allows the Federal Home Loan Bank Board (the Board) to grant certain trust powers to member savings and loan associations upon proper application to the Board. Mid Kansas is willing to submit an application to the Board for the authority to act as trustee for a standby trust agreement for Reid Supply Company. We do not anticipate any problems with receiving an approval and estimate that the application process will take 4 to 6 weeks to complete. The exact terms of the standby trust agreement could be determined upon approval of the Board.

If you have any questions please contact me.

Sincerely,
MID KANSAS FEDERAL SAVINGS AND LOAN ASSOCIATION

Kenneth P. Brasted II
President